

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III  
No. 17-BK-3283-LTS  
(Jointly Administered)

**NOTICE OF WITHDRAWAL OF CERTAIN CLAIMS SUBJECT TO OMNIBUS  
OBJECTIONS OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO  
HIGHWAYS AND TRANSPORTATION AUTHORITY, THE EMPLOYEES  
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY, AND THE  
PUERTO RICO ELECTRIC POWER AUTHORITY**

To The Honorable United States District Judge Laura Taylor Swain:

1. On June 18, 2021, August 5, 2022, September 16, 2022, and October 28, 2022 the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Public Buildings Authority (“PBA”), and the Puerto

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Rico Electric Power Authority (“PREPA,” and, together with the Commonwealth, HTA, ERS, and PBA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> filed various omnibus objections.

2. In light of additional information received since such filings, the Debtors respectfully withdraw, without prejudice, their respective objections to the following proofs of claim (collectively, the “Withdrawn Claims”):

- *Four Hundred Eighty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Deficient Claims* [ECF No. 21738], **solely** with respect to Claim No. 5090;
- *Five Hundred First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21758], **solely** with respect to Claim Nos. 68261, 102209 and 141433;
- *Five Hundred Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21759], **solely** with respect to Claim No. 124586;
- *Five Hundred Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21760], **solely** with respect to Claim Nos. 65910, 69188, 71958, 73977 and 130661;
- *Five Hundred Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21761], **solely** with respect to Claim No. 178511;
- *Five Hundred Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21763], **solely** with respect to Claim Nos. 68722 and 173157;
- *Five Hundred Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21764], **solely** with respect to Claim Nos. 131838 and 141356;

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

- *Five Hundred Ninth Omnibus Objection (Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21765], **solely** with respect to Claim No. 61437;
- *Five Hundred Tenth Omnibus Objection (Substantive) of the Puerto Rico Highways and Transportation Authority, Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and Puerto Rico Public Buildings Authority to Unresponsive ACR Claims* [ECF No. 21766], **solely** with respect to Claim No. 83696;
- *Five Hundred Twenty-Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Deficient ADR Claims* [ECF No. 22260], **solely** with respect to Claim Nos. 49384, 116945 and 122090;
- *Five Hundred Thirty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Deficient Claims* [ECF No. 22265], **solely** with respect to Claim No 122216;
- *Five Hundred Fiftieth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Duplicative Bond Claims* [ECF No. 22737], **solely** with respect to Claim Nos. 30888 and 22078; and
- *Five Hundred Fifty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Duplicative Bond Claims* [ECF No. 22738], **solely** with respect to Claim No. 31087.

3. The Debtors reserve all rights with respect to the Withdrawn Claims, individually and collectively, including to object to the Withdrawn Claims on any grounds whatsoever.

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Dated: December 9, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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